# FINDING

# HEADQUARTERS TIMBER SALE

An Environmental Analysis (EA) has been completed for the proposed Department of Natural Resources and Conservation (DNRC) Headquarters Timber Sale. After a thorough review of the EA, project file, public correspondence, Department policies, standards and guidelines, and the Administrative Rules for Forest Management (ARM 36.11.401-450), I have made the following decisions:

## 1. ALTERNATIVE SELECTED

Two alternatives were presented and were fully analyzed in the EA: the No-Action Alternative, which includes existing activities, but does not include pre-commercial thinning, tree planting, and a timber sale *(EA, 2.5.1)*; and the proposed action, which proposes harvesting up to 2.0 million board feet of timber from 331 acres, 50 acres would be pre-commercially thinned, and 70 acres of planting *(EA 2.5.2)*.

For the following reasons, I have selected the proposed action without additional modifications:

a. In my opinion, the proposed action best meets the purpose and need for action and the specific project objectives listed in the EA in 1.3 ***Project Objectives***. The proposed action generates more return to the school trust than the no action alternative (*EA 4.2.1.2*). The environmental effects of the proposed action are acceptable as compared with the no action alternative. No major losses in habitat, or unacceptable effects to water (*EA 4.3.1.1*) or soil (*EA 4.3.1.2*) would occur under the proposed action. No losses in habitat, or unacceptable effects to Threatened, Endangered (*EA 4.3.4.1*), or Sensitive (*EA 4.3.4.2*) species would occur under the proposed action. The action alternative would reduce the threat of catastrophic wildfire (*EA 4.3.3.1*), promote natural seral tree regeneration (*EA 4.3.3.4*), decrease the susceptibility of remaining trees to insect and disease infestations (*EA 4.3.3.2*), and provide for the opportunity to pre-commercially thin areas and plant seedlings within the analysis area (*EA 4.3.2.5*).

b. The analysis of identified issues did not reveal information compelling the DNRC not to implement the proposed action.

c. The proposed action includes activities to address environmental concerns expressed by DNRC staff and the public.

d. All proposed mitigations are adequate and feasible.

## 2. SIGNIFICANCE OF IMPACTS

For the following reasons, I find that the proposed action would not have significant impacts:

**a. Economic Analysis**
The Action Alternative would return a greater amount back to the School Trust. This increase is described in EA 4.3.2.5 ***Economics***. Within that portion, it has been stated that although there would be forest improvement costs (pre-commercial thinning and planting) which would cost the DNRC approximately

$26,500.00 ("todays" dollar), it would yield up to $662,000.00. That would yield up to $635,500.00. This is much higher than the existing amount of money received under the Action Alternative. The existing amount of income would continue to be received during and after the timber sale.

**b. Forest Health**

The action alternative is designed to bring stands back to an historic condition and the age classes *(EA 4.3.3.2)*. Immediately, these trees could serve as "feeding sites" for bark beetles in the area. These trees would be salvaged if it was economically feasible as part of this project. Generally, harvest would be expected to reduce insect and disease outbreaks in the area *(EA 4.3.3.2)*.

**c. Fire Hazard**

This project is designed to emulate the effects of a low-severity, high frequency fire *(EA 4.3.3.1)*. This will reduce fuel levels that have occurred on theis site (*EA 3.2.3.1*). The thinning and removal of forest fuels and canopies would decrease the general fire intensity and thereby improve the ability to control these fires. Immediately after the harvest, the fresh slash caused by that harvest would temporarily increase the fireline intensity, but that effect would decrease within a few years *(EA 4.3.2.3)*. It can be assumed that this harvest and the decrease in long-term fire behavior would be a benefit to the surrounding landscape and to DNRC cabin leases within the project area *(EA 4.3.3.2)*.

**d. Aesthetics**

Much of the project area can be seen from Highway 200 *(EA 3.2.2.3)*. Immediately after harvest, slash would be evident after harvest *(EA 4.3.2.3)*. The overall proposed activities should blend with the current natural mosaic and past activities on the surrounding landscape *(EA 4.3.1.4)*.

**e. Noxious Weeds**

The project area has several small areas and pockets of noxious weeds *(EA 3.2.1.4)*. Increases of ground disturbance often cause increases the areas that weeds can inhabit. This project would use Integrated Weed Management (IWM) techniques which includes: requiring cleaned equipment, treating existing weed patches with herbicide and insects, and grass seeding new roads, protection of water quality will be done by following label descriptions and not applying it near streams and areas where runoff could reach streams *(EA 4.3.1.4)*.

**f. Soils**

The primary risk to soils and their productivity are compaction and erosion *(EA 4.3.1.2)*. The project has been designed to leave tops, limbs, and unusable pieces of trees within the units to be recycled and return nutrients into the soils *(EA 4.3.1.2)*. To restrict compaction, harvesting would only be done when the forest officer approves soil moisture, skid trail design has been approved (less than 15% of unit area), and approved conditions for ground skidding *(EA 4.3.1.2)*.

**g. Hydrology and Fisheries**

The primary water body within the project area is the Blackfoot River (*EA 3.2.1*). The Blackfoot River is a B-1 Classified Stream in the Montana Surface Water Quality Standards. This standard is for water bodies that are considered suitable for domestic use after conventional treatment, as well as recreation, swimming, and bathing. These streams are suitable for the growth and propagation of salmonid fish and other aquatic animals (*EA 3.2.1.3*). No increases of sediment, settleable solids, oils, or floatable solids that would render the waters harmful, detrimental, or injurious (*EA 3.2.2.1*) are accepted.

Although there is a segment of road near the Blackfoot River, it goes into and outside the Limited Management Zone (LMZ) (*EA 4.3.1.1*) and the conservation easement (*EA 3.2.2.4*). All treatments near the Blackfoot River (outside the LMZ) have been stated to result in a low risk of direct, indirect, and cumulative impacts (*EA 4.3.1.1*) hydrologically, and for cold water fisheries (*EA 4.3.1.3*).

Also during this project, the crossing of Chamberlain Creek will be changed. Currently, there is a temporary bridge (owned by the DNRC) that is placed above a rotten wooden bridge (*EA 3.2.1.1*). This project would replace this structure with a permanent bridge. The 124 permit required for this change has been applied for. This would increase the flow under the bridge to 100 year flood levels (*EA 4.3.1.1*).

**h. Wildlife: Threatened and Endangered Species**

**Bald Eagle:** There is a bald eagle nest cluster near this State section. The currently used nest is within 0.25 mile of portions of this project. A road that is proposed to be used is also adjacent and within the 0.25 mile buffer around the nest area (*EA 3.2.4.1.1*) *(EA Attachment A-8)*. As the primary time of harvest is during the winter, it will be easier to coordinate around the Bald Eagle breeding season and the Bald Eagle Management Plan (ARM 36.11.429).

**Grizzly Bears:** This project area is outside the Northern Continental Divide Ecosystem (NCDE) recovery area and has been used within the past several years *(EA 3.2.4.1.2)*. This section is "closed" to vehicle travel by the general public (*EA 3.2.4.1.2)* and will reduce human and grizzly bear interactions. The timber sale has been designed to use existing topography and visual screening to block the view of grizzly bears *(EA 4.3.4.1.2)*. The harvest would not construct additional road, increase open road densities, or reduce screening along roads and riparian areas (*EA 4.3.4.1.2*).

**i. Wildlife: Sensitive Species**

**Black-backed Woodpecker:** The black-backed woodpecker is an irruptive species that feasts upon wood boring beetles within recently burned (1-5 years) locations *(EA 3.2.4.2.2)*. With the occurrence of the Boles Meadow, Mineral-Primm, Dirty Ike, and Stuart Peak Fires of 2003, there is over 20,000 acres of habitat within the analysis area *(EA3.2.4.2.2)*. These factors and the silvicultural treatments proposed in this project, make the possibility of this project disturbing black-backed woodpeckers low *(EA 4.3.4.2.2)*.

**Pileated Woodpecker:** The Pileated woodpecker is one of the largest woodpeckers in North America *(EA 3.2.4.2.1)*. Pileated woodpeckers require nest snags of 29 inches DBH (but have nested in snags of 15 inches) *(EA 3.2.4.2.1)*. Much of the harvest would reserve the trees within this size class from cutting *(EA 4.3.2.2 and EA 4.3.4.2.1)*. The proposed project would provide low effects to Pileated woodpeckers *(EA 4.3.4.2.1)*.

**Fischer:** Fishers are a medium-sized animal belonging to the weasel family that prefer dense lowland spruce-fir forests with high canopy closure *(EA 3.2.4.2.4)*. The proposed project would harvest approximately 34 acres of the 123 acres of fisher habitat *(EA 4.3.4.2.4)*. Given management on the private and industrial lands, the minor amount of land treated on the State owned parcel, and no treatment within the riparian area, low effects are expected after this project has been implemented *(EA 4.3.4.2.2)*.

**Flammulated Owl:** The flammulated owl is a tiny forest owl that inhabits warm-dry ponderosa pine and cool-dry Douglas-fir forests and is a secondary nester *(EA 3.2.4.2.3)*. Within the project area there is an estimated 627 acres *(EA 3.2.4.2.3)*. Where ponderosa pine is present it would be the preferred leave tree species. The planned silvicultural prescription would reduce canopy closure and reduce the density of shade tolerant species *(EA 4.3.3.4)*. It is expected that harvest would increase the habitat for flammulated owl, and this project would have a low risk of effects *(EA 4.3.4.2.3)*.

**Harlequin Duck:** Harlequin ducks require white water streams with boulder and cobble substrates. They often dive up to 3 to 5 feet under the surface to search for food, so therefore, water quality is of concern *(EA 3.2.4.2.5)*. Since 1989, there have been 3 nests discovered on the Blackfoot River (*EA*

*3.2.4.2.5*).. Since harvest will not occur within the SMZ and LMZ adjacent to the river it is unlikely that sediment would occur. The riparian vegetation would also not be damaged. Any operations would be outside the breeding season of the Harlequin Duck. It is expected that this project would have minor impacts *(EA 4.3.4.2.5).*

**j. Wildlife: Big Game**

**Elk, White-tailed, and Mule Deer:** These members of big game are quite common in the project area. The densely stocked areas provide for thermal protection and hiding cover for the deer in the winter. There are approximately 97 acres of security cover within the project area *(EA 3.2.4.3.2).* Given harvest plans with the project there would be a 63% reduction in snow-intercept cover and a reduction to 43 acres of security cover *(EA 4.3.4.3.2).* This area is across the Blackfoot River from the Clearwater Unit, and is archery only hunting (*EA 3.2.4.3.2).* Given these two situations, the Elk, White-tailed, and Mule Deer would see low effects *(EA 4.3.4.3.2).*

**Moose:** Use of this section is common by moose (*EA 3.2.4.3.1*). The retention of riparian vegetation and Archery-only hunting restrictions, provide for low risk for moose *(EA 4.3.4.3.1).*

**k. Human Environment**

This project is adjacent to the Blackfoot River (*EA 3.2.1*). Generally, this area receives a large amount of recreational use (*EA 3.2.2.1.*). The Russell Gates Memorial Campground is upstream and North of the project area. Campers as well as boaters enjoy this stretch of the River (*EA 3.2.2.2 and EA 3.2.2.1*). This project has given much consideration to logging season and forest improvements (*EA 4.3.1.2*) and Bald Eagle restrictions (*EA 4.3.4.1.1*). The harvest units have been designed with aesthetics as a concern (*EA 4.3.2.3*). The above will all help to keep effects to the human environment at a low level (*EA 4.3.2*).

# 3. SHOULD DNRC PREPARE AN ENVIRONMENTAL IMPACT STATEMENT (EIS)?

Based on the following, I find that an EIS does not need to be prepared:

a. The EA adequately addressed the issues identified during project development and displayed the information needed to make the decisions.

b. Evaluation of the potential impacts of the proposed timber sale indicates that no significant impacts would occur.

c. Sufficient opportunities for DNRC staff and public review and comment during project development and analysis were provided. DNRC staff and public concerns were incorporated into project design and analysis of impacts.

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